

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

AYA HEALTHCARE, INC.,

Plaintiff,

v.

RALPH DE LA TORRE and MEDICAL
PROPERTIES TRUST, INC.,

Defendants.

Case No. 3:24-cv-00390-B

JOINT STATUS REPORT IN RESPONSE TO ECF NO. 34

On May 28, 2024, the parties to the above captioned action filed their Stipulation to Stay Action in Its Entirety (ECF No. 33), requesting that this case be stayed as a result of Steward Health Care Systems, LLC and certain of its affiliates filing for Chapter 11 bankruptcy. *See In re: Steward Health Care System, LLC, et al.*, Case No. 24-90213 (Bankr. S.D. Tex.) (the “Steward Bankruptcy”).

The Court, at ECF No. 34, stayed this action and further ordered the parties to submit a status report every 60 days. Accordingly, the parties hereby jointly submit this Joint Status Report in Response to ECF No. 34.

The Steward Bankruptcy is still pending and has not concluded. The stay has not been lifted. The parties will submit another status report in 60-days per the Court’s order.

[Signature pages follow]

Dated: August 01, 2024

/s/ Peter A. Moir

Peter A. Moir

Texas Bar No. 14254500

peter.moir@morganlewis.com

MORGAN, LEWIS & BOCKIUS LLP

1717 Main Street, Suite 3200

Dallas, TX 75201-7347

Telephone: (214) 466-4000

Facsimile: (214) 466-4001

Charles L. Solomont*

Massachusetts Bar No. 557190

carl.solomont@morganlewis.com

Andrew J. Gallo*

Massachusetts Bar No. 645739

andrew.gallo@morganlewis.com

Michael C. Polovich,*

Massachusetts Bar No. 708139

michael.polovich@morganlewis.com

MORGAN, LEWIS & BOCKIUS LLP

One Federal Street

Boston, MA 02110-1726

Telephone: (617) 341-7700

Facsimile: (617) 341-7701

**Admitted pro hac vice*

Attorneys For Plaintiff Aya Healthcare, Inc.

/s/ Samuel M. Kidder (with permission)

GRAY REED & MCGRAW LLP

Scott Funk

State Bar No. 7550900

London England

State Bar No. 24110313

1601 Elm Street, Suite 4600

Dallas, Texas 75201

Telephone: (214) 954-4135

Facsimile: (214) 953-1332

Email: sfunk@grayreed.com
lengland@grayreed.com

KTBS LAW LLP

David M. Stern (*pro hac vice*)

California Bar No. 67697

Samuel M. Kidder (*pro hac vice*)

California Bar No. 284015

1801 Century Park East, 26th Floor

Los Angeles, California 90067

Telephone: (310) 407-4000

Facsimile: (310) 407-9090

Email: dstern@ktbslaw.com
skidder@ktbslaw.com

***Attorneys For Defendant Medical Properties
Trust, Inc.***

/s/ Will Thompson (with permission)

**QUINN EMANUEL URQUHART &
SULLIVAN LLP**

Will Thompson

3100 McKinnon St, Suite 1125

Dallas, Texas 75201

Telephone: (469) 902-3600

Facsimile: (469) 902-3610

Email: willthompson@quinnemanuel.com

Attorneys For Defendant Ralph de la Torre

CERTIFICATE OF SERVICE

I certify that on August 01, 2024, the foregoing document was filed and served using the Court's ECF system.

/s/ Peter A. Moir
Peter A. Moir